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Clifford M. Harrington, Esq.
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, NW
Washington DC 20037-1122

In re: Blue Ridge Broadcasting, Corporation
WFGW(AM), Black Mountain, NC
Facility Identification Number: 5972
File Number: BP-20080801AST

Dear Mr. Harrington:

This letter is in reference to the above-captioned minor change application filed by CBS Radio, Inc. (CBS) to change site and antenna system, and the January 8, 2009, amendment to supply additional information about the "co-channel field strength measuring adaptor".

A preliminary review of the amended application reveals that field strength measurements made with the aid of a device referred to as a "co-channel field strength measuring adapter," which allegedly permits the measurement of fields that are below the lowest scale on a typical field strength meter, even in the presence of co-channel interference. According to the applicant's engineering exhibit, "(t)he adapter consists of an S&S Engineering model DVFO-II crystal-controlled PLL signal generator, a Switched Capacitor Audio Filter (SCAF), and an audio voltmeter (HP-403B)," which are used in conjunction with a Potomac Instruments AM field strength meter. Typically, applicants who wish to rely on field strength measurements take such measurements with a meter calibrated against a known standard, and having a rated accuracy within certain ranges. In many cases, conductivities derived from such measurements allow an AM assignment to be made which might otherwise result in prohibited contour overlap.[1] Consequently, it is important that field strength measurements be properly made with equipment of known accuracy; and all measurements should be repeatable and subject to independent verification. In this case, we have no way of verifying the accuracy of the device in question. Furthermore, we believe that permitting applicants to use extraordinary means to extract field strength measurement data does not serve the interest of preventing excessive interference in the

[1] In many parts of the country, ground conductivity exhibits well-known seasonal changes. Applicants typically take advantage of seasonal conductivity shifts by performing field strength measurements when conditions are most advantageous to their proposals.

AM band. Therefore, we will not accept the measurements performed with the "co-channel field strength measuring adapter".

Without using the adaptor measurements, we find that the proposed 0.5 mV/m and 0.025 mV/m contours would respectively overlap the 0.025 mV/m and 0.5 mV/m contours of co-channel station WMEV(AM), Marion, Virginia; and the proposed 0.025 mV/m contour would overlap the 0.5 mV/m contour of co-channel station WSPC(AM), Albemarle, North Carolina, in violation of Section 73.37(a) of the Commission's rules.

Accordingly, further action on the subject application will be withheld for a period of thirty (30) days from the date of this letter to provide an opportunity to file a curative electronic amendment. Failure to amend or respond within this time period will result in the dismissal of the application pursuant to Section 73.3568 of the Commission's rules.

Sincerely,

Son Nguyen
Supervisory Engineer
Audio Division
Media Bureau

cc: William Culpepper
David Bruce, Director